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Attorney for Plaintiff
IRENE LUGO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IRENE LUGO,

Plaintiff,

v.

C.R. BARD, INC. and BARD
PERIPHERAL VASCULAR, INC.,

Defendant.

Case No. 2:16-cv-02913-DGC

Consolidated into lead case:
MDL No. 2:15-MD-02641-DGC

**JOHN C. HATCH'S MOTION TO
WITHDRAW AS COUNSEL OF RECORD
FOR PLAINTIFF AND CHANGE OF
ADDRESS; [PROPOSED] ORDER
GRANTING MOTION TO WITHDRAW;
CERTIFICATE**

John C. Hatch, herby moves to withdraw from *pro hac vice* representation of Plaintiff, Irene Lugo. Accordingly, counsel respectfully requests permission to withdraw from further representation of Plaintiff, Irene Lugo, as John C. Hatch is changing law firms. Plaintiff will not be prejudiced as Amir M. Kahana will continue to act as Plaintiff's counsel for representation in this litigation. The updated address for John C. Hatch is 350 Oak Street, Laguna Beach, CA 92651.

A form of order is submitted herewith for the Court's convenience.

RESPECTFULLY SUBMITTED this 13th day of September, 2016

By: /s/ John C. Hatch
Attorney for Plaintiff

MOTION AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL OF RECORD;

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2 I certify that on this 13th day of September, 2016, I electronically transmitted a PDF
3 version of this document to the Clerk of Court, using the CM/ECF System, for filing and
4 for transmittal of a Notice of Electronic Filing.

5 By: /s/ John C. Hatch
6 Attorney for Plaintiff
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**[PROPOSED] ORDER GRANTING
 MOTION TO WITHDRAW AS
 COUNSEL OF RECORD FOR PLAINTIFF
 AND CHANGE OF ADDRESS**

John C. Hatch seeks to withdraw as counsel *pro hac vice* for Plaintiff in the above captioned litigation pursuant to Local R. 83.3(b)(2). As this Court finds that Mr. Hatch has submitted satisfactory reasoning for withdrawal, and that the granting of this motion will not cause substantial prejudice or delay to any party.

IT IS HEREBY ORDERED that John C. Hatch's Motion to Withdraw as Counsel for Plaintiff is GRANTED, and John C. Hatch is hereby terminated as counsel *pro hac vice* in this proceeding.

DATED: _____

By: _____
 Hon. David G. Campbell
 United States District Judge

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5 Attorney for Plaintiff
6 IRENE LUGO

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 IRENE LUGO,

10 Plaintiff,

11 v.

12 C.R. BARD, INC. and BARD
13 PERIPHERAL VASCULAR, INC.,

14 Defendant.
15

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**CERTIFICATE OF JOHN C. HATCH
ACCOMPANYING MOTION FOR
WITHDRAW**

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17 I, John C. Hatch, hereby attest that Plaintiff, Irene Lugo, consents to my withdrawal as
18 her counsel. Plaintiff has been notified in writing of my withdrawal and the status of the case.
19 She is aware that Amir M. Kahana will continue to represent her for this litigation.
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24 By: /s/ John C. Hatch
Attorney for Plaintiff
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